

UNITED STATES DISTRICT COURT  
FOR THE SOUTHERN DISTRICT OF MISSISSIPPI  
SOUTHERN DIVISION

INTERNATIONAL FRESH PRODUCE  
ASSOCIATION, *et al.*,

Plaintiffs,

v.

U.S. DEPARTMENT OF LABOR, *et al.*,

Defendants.

Case No. 1:24-cv-00309-HSO-BWR

**DEFENDANTS' MOTION FOR AN EXTENSION OF TIME TO FILE ANSWER**

Defendants, by and through their undersigned counsel, respectfully request a one-month extension of the current deadline of February 14, 2025, to file their answer to the Amended Complaint, ECF No. 16, such that Defendants' new deadline will be March 14, 2025. The extension is necessary to allow incoming leadership at the Department of Labor time to review this litigation, including the claims that Plaintiffs and Intervenor have asserted challenging the Rule.

Counsel for Defendants conferred with counsel for private and State Plaintiffs, and both consent to the relief sought in this motion.

DATED: February 3, 2025

Respectfully submitted,

BRETT A. SHUMATE  
Acting Assistant Attorney General

JULIE STRAUS HARRIS  
Assistant Branch Director

/s/ Eitan R. Sirkovich  
EITAN R. SIRKOVICH  
Trial Attorney  
Civil Division, Federal Programs Branch  
U.S. Department of Justice  
1100 L Street, NW  
Washington, DC 20005  
Phone: (202) 353-5525  
E-mail: eitan.r.sirkovich@usdoj.gov

*Counsel for Defendants*